

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

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In re:

JOANNE E. LUNN

Debtor

Chapter 13  
Case Number: 19-11275

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PAULA FRUMAN,

Plaintiff

Adv. P. No. 19-01092

v.

JOANNE LUNN,

Defendant

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**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION *IN LIMINE* TO  
EXCLUDE EVIDENCE REGARDING PURCHASE AND SALE OF SHARES**

Plaintiff Paula Fruman ("Fruman") hereby respectfully submits this opposition to the motion *in limine* by Defendant Joanne Lunn ("Lunn") to exclude evidence of the amount paid by Fruman's late husband Jeffrey to Tim Bradley for shares of JT Electronics stock. The motion *in limine* should be denied because the judgment debt at issue in this adversary proceeding specifically arises out of an underlying lawsuit wherein it was alleged that Lunn destroyed the corporate integrity of JT Electronics, a company that was owned by Fruman at the time, by using its corporate form for Lunn's own greed and misconduct, including through repeated misrepresentations by Lunn to multiple parties concerning the ownership of JT Electronics. More specifically, a Judgment on Jury Verdict entered March 8, 2017 in Suffolk Superior Court, Civil Action No. 1384CV02976, in a case brought by Fruman against Lunn, in the total amount of \$514,369.00, that Lunn now seeks to discharge by way of the pending bankruptcy proceedings.

The Suffolk County jury heard evidence of the transfer to Tim Bradly and the value of that transfer is a directly relevant to the issues of the present case. To the extent that Lunn argues that the stated transfer amount was not actually paid, Lunn may so testify at trial, assuming she has adequate foundation, but that does not warrant the exclusion of evidence of the stated transfer amount.

WHEREFORE, Fruman respectfully requests Lunn's motion *in limine* to exclude the amount paid by Fruman's husband Jeffrey to Tim Bradley be denied.

Respectfully submitted,  
PAULA FRUMAN,  
By her attorneys,

Dated: June 17, 2020

/s/ Peter J. Duffy  
Barry S. Pollack, (BBO#642064)  
Peter J. Duffy (BBO#566682)  
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#### **CERTIFICATE OF SERVICE**

I, Peter J. Duffy, do hereby certify this 17<sup>th</sup> day of June 2020 that I served a copy of the foregoing via ECF to Joanne Lunn via her counsel of record who are registered.

/s/ Peter J. Duffy  
Peter J. Duffy